

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 24-cr-20043-JPM
)	
vs.)	
)	
AUSTIN LINEBACK,)	
)	
Defendant.)	

MOTION FOR A PROTECTIVE ORDER

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States hereby moves this Court for entry of a Protective Order that will ensure the confidentiality of any information that would tend to identify child victims of sexual abuse included within the discovery and evidence in this case.

Entry of a protective order restricting the use, dissemination, and disposition of material containing any information that tends to identify a child victim of sexual abuse is essential to permit the United States to provide complete discovery to the Defendant while protecting the identity and privacy of child victims of sexual abuse.

The United States respectfully requests that the Court order that the discovery and disclosure of the unredacted reports and recorded statements be subject to the following conditions and restrictions:

- 1) the materials provided are for the sole use of counsel in preparing for the defense of this case¹ and shall not be copied, reproduced or otherwise disseminated to third parties,

¹ “[U]se of counsel in preparing the defense of this case” contemplates and permits dissemination to counsel’s staff, experts, consultants, interpreters, and other parties contracted with

or used for any other purpose, except that counsel may provide a copy to Defendant under the same conditions; and

- 2) notwithstanding any ethical rules governing file preservation, retention and destruction, counsel and Defendant are required to destroy the audio and video recordings within 45 days of the conclusion of this case² or to return all such materials to counsel for the United States.

Counsel for the United States has consulted with Needum Germany, counsel for the Defendant, about the terms of the protective order, and the above language represents the agreement of the parties.

Respectfully submitted,

KEVIN G. RITZ
United States Attorney

By: /s/ Lynn Crum
Lynn Crum
Assistant U.S. Attorney
United States Attorney's Office, WDTN

counsel for the defense of this case. Counsel should be required to take all reasonable steps to ensure that persons receiving such identifying information do not use or disclose any such information for any purpose other than for use in this case.

² The case should be deemed concluded after all trial and appellate proceedings or upon the expiration of the time to commence any further proceedings.

CERTIFICATE OF SERVICE

I, Lynn Crum, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing pleading was forwarded by electronic means via the court's electronic filing system to counsel for the defendant.

This the 19th day of March, 2024.

/s/ Lynn Crum
Lynn Crum
Assistant United States Attorney